REMARKS

Claims 1-29 are pending in the present application. The claims have been amended to remove the use of acronyms.

A. Rejection under Obviousness-Type Double-Patenting

Claims 3-29 have been **provisionally** rejected under the doctrine of Obviousness-type Double-patenting in view of co-pending US Patent Application Number 10/342,610. Since this rejection is provisional, co-pending US Patent Application Number 10/342,610 has not been allowed, and the presently pending claims have also been rejected under 35 U.S.C. §102(e), the Applicants will not address the provisional Obviousness-type Double-patenting at this time.

B. Rejection under 35 U.S.C. §102(e)

Claims 1-29 have been rejected under 35 U.S.C. §102(e) for being anticipated by Seseck et al. (Published US Patent Application 2003/0086098). This rejection is respectfully traversed.

1. Independent Claim 1

In formulating the rejection of independent claim 1 under 35 U.S.C. §102(e), the Examiner alleges that Seseck et al. discloses, at paragraph **[0030]**, a method for creating reusable composite components from interpreted pages of rendered document during dynamic document construction. Moreover, the Examiner alleges that Seseck et al. discloses, at paragraph **[0031]**, obtaining a list of document components from the page and identifying any non-cached components; at paragraph **[0031]**, caching individual reusable document components rendered to their respective bounding box dimensions; at paragraph **[0032]**, permuting the reusable document components into composite combinations of reusable document components; at paragraph **[0032]**, caching each of composite reusable document component rendered relative to each other in a bounding box of sufficient size to adequately contain the combination; at paragraph **[0034]**, combining reusable document components in their relative positions to form composite reusable underlays; and, at paragraph **[0034]**, caching said

composite reusable underlays rendered to full page size. Based upon these allegations, the Examiner concludes that the presently claimed invention is anticipated by Seseck et al. These allegations and conclusion are respectfully traversed.

As set forth above, independent claim 1 recites a method for creating reusable composite components from interpreted pages of rendered document during dynamic document construction by obtaining a list of document components from the page and identifying any non-cached components; caching individual reusable document components rendered to their respective bounding box dimensions; permuting the reusable document components into composite combinations of reusable document components; caching each of composite reusable document component rendered relative to each other in a bounding box of sufficient size to adequately contain the combination; combining reusable document components in their relative positions to form composite reusable underlays; caching said composite reusable underlays rendered to full page size.

For example, independent claim 1 explicitly recites obtaining a list of document components from the page and identifying any non-cached components. In contrast, Seseck et al. teaches obtaining a list of system components.

More specifically, Seseck et al. discloses, at paragraph **[0031]**:

> Memory 150 stores a pre-printing controller 156, a browsing module 158, a pre-rendering engine 160, a pre-ripping engine 162, a pre-ripped document list 164, a print engine 168, a print controller 170, and an optional access log 172. These system components 156-172 are each a series of one or more instructions executable by processor 146. Indications of accessed web pages are received by pre-printing controller 156 from client 134. Pre-printing controller 156 manages the generation and storage of documents in print-ready format. The print-ready format, as used herein, refers to a format in which the document is saved as hardware-ready bits that can be supplied directly to a print engine and used by the print engine to control the application of print substance to the print medium.

As disclosed by Seseck et al., paragraph **[0031]** of Seseck et al. discloses the listing of system components; i.e., the components of the printing system. On the other hand, independent claim 1 recites obtaining a list of **document** components from the page and identifying any non-cached components.

Therefore, contrary to the Examiner's allegations, <u>Seseck et al</u>. fails to anticipate the presently claimed invention as set by independent claim 1.

2. Independent Claim 2

In formulating the rejection of independent claim 2 under 35 U.S.C. §102(e), the Examiner alleges that <u>Seseck et al</u>. discloses, at paragraph **[0030]**, a method for rendering pages having a combination of reusable components and non-cached components. Moreover, the Examiner alleges that <u>Seseck et al</u>. discloses, at paragraph **[0030]**, assessing said rendered page for the possibility of having an underlay-overlay pair; at paragraph **[0032]**, searching a cache of reusable underlays for underlays having the reusable document components needed by the page; at paragraph **[0036]**, if the correct reusable underlay is not found in cache then generating a composite reusable underlay from the reusable document components of said page and caching said reusable underlay rendered to full page size; at paragraph **[0036]**, creating a full page size overlay from the non-cached components that is retained until it is mated with the cached reusable underlay; at paragraph **[0036]**, if the correct underlay is found in cache then retrieving the reusable underlay; and, at paragraph **[0037]**, rendering, along with the overlay, the page therefrom. Based upon these allegations, the Examiner concludes that the presently claimed invention is anticipated by <u>Seseck et al</u>. These allegations and conclusion are respectfully traversed.

As set forth above, independent claim 2 recites a method for rendering pages having a combination of reusable components and non-cached components by assessing said rendered page for the possibility of having an underlay-overlay pair; searching a cache of reusable underlays for underlays having the reusable document components needed by the page; if the correct reusable underlay is not found in cache then generating a composite reusable underlay from the reusable document components of said page and caching said reusable underlay rendered to full page size; creating a full page size overlay from the non-cached components that is retained until it is mated with the cached reusable underlay; if the correct underlay is found in cache then retrieving the reusable underlay; and, rendering, along with the overlay, the page therefrom.

For example, independent claim 2 explicitly recites searching a cache of reusable underlays for underlays having the reusable document components needed by the page. In contrast, <u>Seseck et al</u>. teaches storing print-ready documents.

More specifically, <u>Seseck et al</u>. discloses, at paragraph **[0032]**:

> Pre-printing controller 156 maintains a record of print-ready documents in a print-ready document list 164. The print-ready documents are those which have been previously received by printer 132 and converted into a print-ready form. The print-ready documents themselves are stored in a print-ready file cache 166 in mass storage device 152. Alternatively, cache 166 may be stored in memory (e.g., memory 150), or stored on a separate device (e.g. a network drive) remote from printer 132 (not shown).

As disclosed by <u>Seseck et al</u>., paragraph **[0032]** of <u>Seseck et al</u>. discloses that the print-ready documents are stored in a print-ready cache; i.e., complete documents are stored in the cache. On the other hand, independent claim 2 recites **searching** a cache of reusable underlays **for underlays having the reusable document components needed by the page**.

Therefore, contrary to the Examiner's allegations, <u>Seseck et al</u>. fails to anticipate the presently claimed invention as set by independent claim 2.

3. Independent Claim 3

In formulating the rejection of independent claim 3 under 35 U.S.C. §102(e), the Examiner alleges that <u>Seseck et al</u>. discloses an electro-photographic method. Moreover, the Examiner alleges that <u>Seseck et al</u>. discloses, at paragraph **[0030]**, receiving a page description language representation of a print job; at paragraph **[0030]**, converting the page description language representation into a print job pixel map; at paragraphs **[0035]** and **[0037]**, during the converting and responsive to identifying a reusable document component hint, searching a reusable document component repository for a corresponding reusable document component or composite reusable document component pixel map, or a reusable underlay and either integrating a found corresponding pixel map into the print job, or rasterizing the identified reusable document component to generate a pixel map, integrating the generated pixel map into the print job, storing the generated pixel map in the reusable document component

repository, and generating a reusable underlay therefrom; and, at paragraph **[0039]**, electro-photographically printing the print job pixel map. Based upon these allegations, the Examiner concludes that the presently claimed invention is anticipated by <u>Seseck et al</u>. These allegations and conclusion are respectfully traversed.

As set forth above, independent claim 3 recites an electro-photographic method by receiving a page description language representation of a print job; converting the page description language representation into a print job pixel map; during the converting and responsive to identifying a reusable document component hint, searching a reusable document component repository for a corresponding reusable document component or composite reusable document component pixel map, or a reusable underlay and either integrating a found corresponding pixel map into the print job, or rasterizing the identified reusable document component to generate a pixel map, integrating the generated pixel map into the print job, storing the generated pixel map in the reusable document component repository, and generating a reusable underlay therefrom; and electro-photographically printing the print job pixel map.

For example, independent claim 3 explicitly recites during the converting and responsive to identifying a reusable document component hint, searching a reusable document component repository for a corresponding reusable document component or composite reusable document component pixel map, or a reusable underlay and either integrating a found corresponding pixel map into the print job, or rasterizing the identified reusable document component to generate a pixel map, integrating the generated pixel map into the print job, storing the generated pixel map in the reusable document component repository, and generating a reusable underlay therefrom.

In contrast, <u>Seseck et al</u>. teaches the retrieving of a web page data and comparing it with the print-ready documents in the printer cache. More specifically, <u>Seseck et al</u>. discloses, at paragraph **[0035]**:

If the URL received from client 134 does exist in list 164, then a check is made as to whether the web page received from server 136 has been modified since the print-ready version of the web page was saved in cache 166. This check can be performed in a variety of different manners, and in one implementation list 164 includes, for each file in cache 166, a timestamp of when the file was last modified (or alternatively, a timestamp of when the file was saved to cache 166). The timestamp on the web page received from server 136 can thus be compared to the timestamp in list 164, and a determination made that the web page has been modified since the print-ready version was saved in cache 166 if the timestamp received from server 136 is later than the timestamp in list 164.

As disclosed by Seseck et al., paragraph **[0035]** of Seseck et al. discloses that the comparing of the web page received from a server with the print-ready documents stored in a print-ready cache. On the other hand, independent claim 3 recites **during the converting and responsive to identifying a reusable document component hint**, searching a reusable document component repository for a **corresponding** reusable document component or composite reusable document component pixel map. In other words, independent claim 3 recites that a reusable document component repository is searched for a reusable document component corresponding to the page description language being converted.

Therefore, contrary to the Examiner's allegations, Seseck et al. fails to anticipate the presently claimed invention as set by independent claim 3.

4. Independent Claim 8

In formulating the rejection of independent claim 8 under 35 U.S.C. §102(e), the Examiner alleges that Seseck et al. discloses, at paragraph **[0030]**, an apparatus for processing documents each represented by a document description encoded in a page description language supportive of reusable data. Moreover, the Examiner alleges that Seseck et al. discloses, at paragraph **[0034]**, a page description language interpreter that receives the document description and parses the document description into reusable document components and which combines said components into composites of reusable components and reusable underlays; at paragraph **[0039]**, an imager, communicating with the interpreter, that creates image representations of received

document components; and, at paragraph **[0047]**, a reusable document component repository that stores image representations derived from a plurality of processed documents, the reusable document component repository communicating with the interpreter and the imager to supply those ones of the image representations corresponding to selected document components of the processed documents and to receive selected image representations created by the imager during the processing of documents. Based upon these allegations, the Examiner concludes that the presently claimed invention is anticipated by Seseck et al. These allegations and conclusion are respectfully traversed.

As set forth above, independent claim 8 recites an apparatus for processing documents each represented by a document description encoded in a page description language supportive of reusable data. The apparatus includes a page description language interpreter that receives the document description and parses the document description into reusable document components and which combines said components into composites of reusable components and reusable underlays; an imager, communicating with the interpreter, that creates image representations of received document components; and a reusable document component repository that stores image representations derived from a plurality of processed documents, the reusable document component repository communicating with the interpreter and the imager to supply those ones of the image representations corresponding to selected document components of the processed documents and to receive selected image representations created by the imager during the processing of documents.

For example, independent claim 8 explicitly recites a page description language interpreter that receives the document description and parses the document description into reusable document components and which combines said components into composites of reusable components and reusable underlays. In contrast, Seseck et al. teaches the retrieving of a web page data and comparing it with the print-ready documents in the printer cache.

More specifically, Seseck et al. discloses, at paragraph **[0034]**:

The web page data is received by browsing module 158 and stored in memory 150. Some of the data received as part of a web page may include a timestamp indicating the last time the web page was modified (the timestamp may be part of the page that is displayed by a browser when displaying the page, or alternatively included in control information that is not displayed). Controller 156 compares the web page to print-ready document list 164 to determine whether a print-ready version of this web page is already stored in cache 166. This comparison can be performed in a variety of different manners, and in one implementation list 164 includes, for each file in cache 166, the URL of the web page corresponding to the file. The URL received from client 134 can then be compared to the URLs in list 164, and if the received URL exists in list 164 then a print-ready version of the document is already in cache 166. Alternatively, the determination of whether a print-ready version of a web page is already stored in cache 166 may be performed after the indication of the web page is received from client 134, but prior to retrieval of the web page from server 136 by browsing module 158. However, even if the web page does already exist in cache 166, at least a portion of the web page is still retrieved from server 136 so that the timestamps can be compared, as discussed below.

As disclosed by <u>Seseck et al</u>., paragraph **[0034]** of <u>Seseck et al</u>. discloses that the comparing of the web page received from a server with the print-ready documents stored in a print-ready cache. On the other hand, independent claim 8 recites a page description language interpreter that **receives the document description and parses the document description into reusable document components** and which combines said components into composites of reusable components and reusable underlays.

Therefore, contrary to the Examiner's allegations, <u>Seseck et al</u>. fails to anticipate the presently claimed invention as set by independent claim 8.

5. Independent Claim 17

In formulating the rejection of independent claim 17 under 35 U.S.C. §102(e), the Examiner alleges that <u>Seseck et al</u>. discloses, at paragraph **[0034]**, receiving a document description including at least one selected reusable document component and combining said components into composites of reusable components and reusable underlays; at paragraph **[0035]**, querying a reusable document component repository containing stored image representations of reusable document components to locate a selected stored image representation corresponding to the selected reusable document component; at paragraphs **[0036]**, conditional upon the querying, identifying one of the

stored image representations as corresponding to the selected reusable document component and retrieving the selected stored image representation corresponding to the selected reusable document component, or, not identifying one of the stored image representations as corresponding to the selected reusable document component, generating an image representation for the selected reusable document component, and storing the generated image representation in the reusable document component repository; and, at paragraph **[0037]**, converting the document description to a document image representation, the converting including incorporating the selected or generated image representation corresponding to the selected reusable document into the document image representation. Based upon these allegations, the Examiner concludes that the presently claimed invention is anticipated by Seseck et al. These allegations and conclusion are respectfully traversed.

As set forth above, independent claim 17 recites a document construction method by receiving a document description including at least one selected reusable document component and combining said components into composites of reusable components and reusable underlays; querying a reusable document component repository containing stored image representations of reusable document components to locate a selected stored image representation corresponding to the selected reusable document component; conditional upon the querying, identifying one of the stored image representations as corresponding to the selected reusable document component and retrieving the selected stored image representation corresponding to the selected reusable document component, or, not identifying one of the stored image representations as corresponding to the selected reusable document component, generating an image representation for the selected reusable document component, and storing the generated image representation in the reusable document component repository; and converting the document description to a document image representation, the converting including incorporating the selected or generated image representation corresponding to the selected reusable document into the document image representation.

For example, independent claim 17 explicitly recites receiving a document description including at least one selected reusable document component and combining said components into composites of reusable components and reusable underlays. In contrast, Seseck et al. teaches the retrieving of a web page data and comparing it with the print-ready documents in the printer cache.

More specifically, Seseck et al. discloses, at paragraph **[0034]**:

> The web page data is received by browsing module 158 and stored in memory 150. Some of the data received as part of a web page may include a timestamp indicating the last time the web page was modified (the timestamp may be part of the page that is displayed by a browser when displaying the page, or alternatively included in control information that is not displayed). Controller 156 compares the web page to print-ready document list 164 to determine whether a print-ready version of this web page is already stored in cache 166. This comparison can be performed in a variety of different manners, and in one implementation list 164 includes, for each file in cache 166, the URL of the web page corresponding to the file. The URL received from client 134 can then be compared to the URLs in list 164, and if the received URL exists in list 164 then a print-ready version of the document is already in cache 166. Alternatively, the determination of whether a print-ready version of a web page is already stored in cache 166 may be performed after the indication of the web page is received from client 134, but prior to retrieval of the web page from server 136 by browsing module 158. However, even if the web page does already exist in cache 166, at least a portion of the web page is still retrieved from server 136 so that the timestamps can be compared, as discussed below.

As disclosed by Seseck et al., paragraph **[0034]** of Seseck et al. discloses that the comparing of the web page received from a server with the print-ready documents stored in a print-ready cache. On the other hand, independent claim 17 recites receiving a document description **including at least one selected reusable document component** and **combining** said **components into composites of reusable components and reusable underlays**.

Therefore, contrary to the Examiner's allegations, Seseck et al. fails to anticipate the presently claimed invention as set by independent claim 17.

6. Dependent Claims

With respect to dependent claims 4-7, 9-16, and 18-29, the Applicants, for the sake of brevity, will not address the reasons supporting patentability for these individual dependent claims, as these claims depend directly or indirectly from allowable independent claims 3, 8, and 17. The Applicants reserve the right to address the patentability of these dependent claims at a later time, should it be necessary.

Accordingly, in view of the remarks set forth above, the Examiner is respectfully requested to reconsider and withdraw the rejection under 35 U.S.C. §102(e).

CONCLUSION

Accordingly, in view of all the reasons set forth above, the Examiner is respectfully requested to reconsider and withdraw the present rejections. Also, an early indication of allowability is earnestly solicited.

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